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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF JOINDER
TO OMNIBUS OBJECTIONS OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS (SUBSTANTIVE) TO
CLAIMS FILED BY THE
DEPARTMENT OF HOMELAND
SECURITY/FEDERAL EMERGENCY
MANAGEMENT AGENCY (CLAIMS
NOS. 59692, 59734 & 59783) AND TO
CLAIMS FILED BY CALIFORNIA
GOVERNOR'S OFFICE OF
EMERGENCY SERVICES (CLAIM
NOS. 87748, 87754, & 87755)**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Re: Docket Nos. 4943, 5096, 5319, 5320

1 I, STEVEN M. CAMPORA, declare:

2 1. I am an attorney with the Law Firm of Dreyer, Babich, Buccola, Wood, Campora LLP,
3 attorneys of record for the fire victims named in this joinder. In addition, my office represents
4 several thousand other fire victims.

5 2. I have been involved in the fire litigation involving PG&E for a number of years,
6 specifically including, but not limited to litigation arising from the Butte Fire, thte Nuns Fire, the
7 Atlas Fire, the Cascade Fire and the Tubbs Fire. I was and remain on Plaintiffs' Liaison Counsel
8 in the Butte Fire JCCP in Sacramento County Superior Court and I am on the Plaintiffs' Executive
9 Committee for the North Bay Fires JCCP.

10 3. I have personally taken more than 60 depositions of witnesses and experts in litigation
11 relating to the Butte Fire and the North Bay Fires, specifically including Nuns, Cascade, Tubbs and
12 Atlas. Those depositions include witnesses to the fires, PG&E employees, Cal Fire investigators
13 and experts designated by the parties. I have met with cause and origin experts concerning the
14 Nuns, Cascade, Tubbs, Atlas and Camp Fires. I have personally reviewed several hundred
15 thousand pages of documents produced by Pacific Gas and Electric Company. I have reviewed
16 hundreds of scene photographs relating to the various fires and I have personally been to the scene
17 of Nuns, Cascade, Atlas and Tubbs Fire. I am familiar with all of the available evidence which was
18 gathered in prosecuting the actions against Pacific Gas & Electric Company. I personally retained
19 experts who inspected and photographed the scene of the Camp Fire, the Nuns Fire, the Cascade
20 Fire, the Atlas Fire and the Tubbs Fire. I have reviewed documents relating to the maintenance of
21 the Caribou Palermo Transmission Line. I have reviewed reports concerning notice to Pacific Gas
22 and Electric Company concerning the method of failure of the hook on the Caribou Palermo Line.

23 4. I am unaware of any evidence which indicates or tends to indicate that any person
24 employed by Pacific Gas and Electric Company intentionally caused any North Bay Fires,
25 specifically including the Nuns, Cascade, Tubbs, and/or Atlas Fire. I am unaware of any evidence
26 which indicates or tends to indicate that any person employed by Pacific Gas and Electric Company
27 intentionally caused the Camp Fire.
28

1 5. During the course of discovery no evidence was discovered which indicated that PG&E
2 intentionally caused the fires. As it relates to the Tubbs Fire, the Cal Fire witnesses and experts
3 were not able to identify any specific evidence of the ignition source. (See for example the
4 Deposition of Scott Lohse, page 529, Exhibit A, and the Deposition of Jim Nolt, page 63, Exhibit
5 B.)

6 6. During the course of discovery and investigation, concerning the Tubbs Fire, Plaintiffs
7 discovered a security video from a winery across the street from 1128 Bennett Lane. 1128 Bennett
8 Lane was generally acknowledged as the area of origin of the Tubbs Fire. The video showed a
9 flash of light, from the direction of 1128 Bennett Lane, at 9:20 p.m. on the night of the fire. The
10 Plaintiffs also discovered two fuses on Pole 773, located on 1128 Bennett Lane, blew at 9:20 p.m.
11 on the night of the fire. (See the Deposition of Jim Nolt, pages 206-208, Exhibit B.) Plaintiffs also
12 discovered arc marks on PG&E distribution line on 1128 Bennett Lane. A true and correct copy of
13 a photograph of one of the marks is attached hereto as Exhibit C. Plaintiffs discovered evidence
14 indicating that arcing on the distribution line would have caused the fuses on Pole 773 to blow. Mr.
15 Nolt confirmed that the flash of light and the fuses blowing were not “coincidence.” (See the
16 Deposition of Jim Nolt, pages 206-208, Exhibit B.) The evidence discovered by Plaintiffs
17 demonstrates that the cause of the Tubbs Fire was a tree or branch coming in contact with a PG&E
18 distribution line. Plaintiffs did not discover evidence that PG&E intentionally caused the subject
19 fire.

20 I declare under penalty of perjury of the laws of the State of California that the foregoing
21 is true and correct. Executed this 12th day of February 2020, at Sacramento, California.

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Steven M. Campora

EXHIBIT A

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

Coordinating Proceeding,) Case No.
Special Title (Rule 3.550),) JCCP No. 4955
)
CALIFORNIA NORTH BAY FIRE)
CASES,)
-----)

CONTINUED VIDEOTAPED DEPOSITION OF CAL FIRE CAPTAIN

SPECIALIST SCOTT LOHSE

Chico, California

Friday, October 18, 2019

Volume II

Reported by:

KAYLA M. KNOWLES

CSR No. 14071

Job No. 3598815

PAGES 309 - 556

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Veritext Legal Solutions
866 299-5127

1 BY MR. PEABODY:

2 Q Sir, when a conclusion says that there's an
3 unknown electrical event affecting privately owned
4 conductor or equipment, what is -- what is being
5 communicated by "affecting"? 03:49:35

6 MS. WELCHANS: Objection. Lacks
7 foundation.

8 MR. MACDONALD: Also vague.

9 BY MR. PEABODY:

10 Q Did you ever discuss that with John 03:49:41
11 Martinez?

12 A That would -- affecting means having a
13 cause and effect; so something happening to damage
14 those lines that would result in a fire.

15 Q Well, do you have any evidence that the 03:49:56
16 privately owned conductor or equipment caused the
17 fire?

18 MS. WELCHANS: Objection. Asked and
19 answered several times.

20 THE WITNESS: No. 03:50:05

21 MR. MACDONALD: Join.

22 BY MR. PEABODY:

23 Q Sir, did you do any report writing after
24 October 27th?

25 MR. MACDONALD: Asked and answered. 03:50:45

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EXHIBIT B

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO

Coordination Proceeding,) JCCP No. 4955
Special Title (Rule 3.550))
)
CALIFORNIA NORTH BAY FIRE CASES)
-----)
AND RELATED CROSS-ACTIONS.)
-----)

VIDEOTAPED DEPOSITION OF JIM NOLT

Sacramento, California
Tuesday, October 8, 2019
Volume I

Reported by:
CARLA SOARES
CSR No. 5908
JOB No. 3562334

PAGES 1 - 225

1 Q And have you ever investigated a fire 10:42:19
2 where you found that an arcing event at 120 volts or
3 240 volts was able to start a fire?
4 MS. WINSOR: Objection. Compound.
5 THE WITNESS: Yes. There are lots of 10:42:38
6 arcing events that provide sources of ignition,
7 provided the fuels are available.
8 BY MR. PICKETT:
9 Q Okay. But in this case, you didn't find
10 any evidence of arcing on any of the private 10:42:47
11 electrical lines, right?
12 A That's -- yes, that's true.
13 Q Okay. Now, typically, what are the ranges
14 of -- let me back up.
15 I think most people are familiar with a 10:43:05
16 circuit breaker box in their house, and those have
17 circuit breakers in them that trip or turn off the
18 power if there's an electrical fault of some
19 magnitude; is that a fair statement?
20 A Yes. 10:43:20
21 Q And those breakers, what are the range in
22 amps that those breakers are usually rated at,
23 approximately, in your experience?
24 MS. WINSOR: Objection to foundation,
25 assumes facts. 10:43:32

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1 Q About midway in that paragraph it says, 15:07:20
2 "The event and interval data for the meters at 1200
3 Bennett Lane and 1177 Bennett Lane, provided at
4 PGE-CF 0-142683, show that the 1200 Bennett and 1177
5 Bennett meters recorded outage events at 9:20 p.m. 15:07:39
6 on October 8th, 2017."
7 Did I read that accurately?
8 A Yes.
9 Q Then it says, "consistent with 19 other
10 smart meters downstream of Fuse 773." 15:07:51
11 Do you see that?
12 A Yes.
13 Q So that means there were 21 smart meters
14 that recorded outage events all at 9:20 p.m., true?
15 A Yes. 15:08:03
16 Q It says "All of this data is consistent
17 with Fuse 773 operating at 9:20 p.m. and
18 de-energizing the residences downstream of that fuse
19 at that time, including 1128, 1200 and 1177 Bennett
20 Lane." 15:08:19
21 A Yes.
22 Q Based on your investigation, you
23 understand -- strike that.
24 Based on that information, was it your
25 understanding that there was no power on the Zink 15:08:31

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1 property after 9:20 p.m. on October 8th? 15:08:35
2 A What is the Zink property?
3 Q 1128 Bennett Lane.
4 A That's -- yes, that's what the data is
5 saying. 15:08:58
6 Q Okay. And the data also says that the
7 fuses blew at the same time as the arcing event,
8 true?
9 MS. WINSOR: Vague as to "arcing event."
10 Assumes facts. 15:09:10
11 BY MR. CAMPORA:
12 Q Let's do it this way: You looked at the
13 picture of the flash, right?
14 A Yes.
15 Q The flash happens at 9:20, correct? 15:09:14
16 A Yes.
17 Q This says that the fuse blew at 9:20,
18 correct?
19 A Yes.
20 Q Okay. Did you know that when you wrote 15:09:20
21 your report in December of 2018?
22 A Yes.
23 Q Okay. You make no mention of that fact.
24 A But they were all unrelated pieces that I
25 couldn't put together into a meaningful whole. 15:09:54

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1 Q But you do know now, sitting here today, 15:09:58
2 that there is a flash which appears to be an arcing
3 event at 9:20, correct?
4 MS. WINSOR: Assumes facts.
5 MS. NORTH: Objection. 15:10:07
6 THE WITNESS: There's a flash.
7 BY MR. CAMPORA:
8 Q Okay. And you do know that the fuses blew
9 at 9:20, correct?
10 A That's what the document says. 15:10:13
11 Q Okay. And sitting here today, sir, do you
12 think that was just coincidence?
13 MS. NORTH: Objection. Argumentative.
14 THE WITNESS: It's unlikely.
15 BY MR. CAMPORA: 15:10:31
16 Q It's unlikely to be coincidence, true?
17 A Yes.
18 Q I want to do a couple things because the
19 jury is going to watch this, and we've been using
20 words that they don't have any idea what they are or 15:10:46
21 mean.
22 You talked earlier today about ohms.
23 Do you remember that? You mentioned ohms.
24 A Okay.
25 Q Can you tell the jury what an ohm is? 15:10:54

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EXHIBIT C

NO 60050